

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

VICTOR ZILBERMAN,

Plaintiff,

v.

CAROFFER, LLC, a Delaware limited
liability company, and PEARL
TECHNOLOGY HOLDINGS, LLC, a Texas
limited liability company,

Defendants.

Case No. 4:15-cv-00589-ALM

[Hon. Amos L. Mazzant, III]

STIPULATION OF DISMISSAL

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff Victor Zilberman (“Zilberman” or “Plaintiff”) and Defendant Pearl Technology Holdings, LLC (“Pearl,” and collectively, the “Parties”), hereby stipulate to dismiss this action in its entirety with prejudice as to the individual claims of Plaintiff, and without prejudice as to the claims of the putative Classes. Each side shall bear its own costs.

Date: September 20, 2016

Respectfully submitted,

VICTOR ZILBERMAN,

By: /s/ Ari J. Scharg

One of Plaintiff’s Attorneys

Rafey S. Balabanian (*Pro Hac Vice*)

rbalabanian@edelson.com

Ari J. Scharg (*Pro Hac Vice*)

ascharg@edelson.com

Alicia E. Hwang (*Pro Hac Vice*)

ahwang@edelson.com

EDELSON PC

350 North LaSalle Street, Suite 1300
Chicago, Illinois 60654
Tel. (312) 589-6370
Fax. (312) 589-6378

W. Craft Hughes (TX Bar No. 24046123)
craft@hughesellzey.com
Jarrett L. Ellzey (TX Bar No. 24040864)
Jarrett@hughesellzey.com
HUGHES ELLZEY LLP
2700 Post Oak Blvd., Suite 1120
Houston, Texas 77056
Tel. (888) 350-3931
Fax. (888) 995-3335

PEARL TECHNOLOGY HOLDINGS, LLC

By: /s/ Walter A. Herring
One of Defendant's Attorneys

Walter A. Herring (TX Bar No. 09535300)
WHerring@munckwilson.com
Ted A. Huffman (TX Bar No. 24089015)
thuffman@munckwilson.com
MUNCK WILSON MANDALA, LLP
12770 Coit Road, Suite 600
Dallas, Texas 75251
Tel: 972.628.3600
Fax: 972.628.3616

CERTIFICATE OF SERVICE

I, Ari J. Scharg , an attorney, hereby certify that on September 20, 2016, I served the above and foregoing ***Stipulation of Dismissal*** by causing a true and accurate copy of such paper to be filed and transmitted to all counsel of record via the Court's CM/ECF electronic filing system, on this the 20th day of September 2016.

/s/ Ari J. Scharg _____